



**NEW YORK CITY HOUSING AUTHORITY
LAW DEPARTMENT**
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GREGORY P. RUSS
Chair & CEO
LISA BOVA-HIATT
EVP of Legal Affairs and General Counsel

**APPLICATION GRANTED
SO ORDERED** *Vern Bro*
VERNON S. BRODERICK
U.S.D.J. 3/11/2020

WRITER'S DIRECT LINE
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March 10, 2020

Via ECF

The Honorable Judge Vernon S. Broderick
United States District Court
Southern District of New York
40 Foley Square, Room 415
New York, New York 10007

Re: *Colon v. The City of New York, et al.*, No. 16-CV-4540

Dear Judge Broderick:

I am counsel for Defendants New York City Housing Authority ("NYCHA"), Michael Kelly, and Brian Clarke (collectively, "the NYCHA Defendants") in the above-referenced matter.

Pursuant to Rule 4.D. of the Court's Individual Rules & Practices, the NYCHA Defendants respectfully request permission to file a total of six declarations in opposition to Plaintiff Sibyl Colon's summary judgment motion. In addition to the four declarations submitted in support of their summary judgment motion against Plaintiff Colon, the NYCHA Defendants wish to submit two additional declarations – one of which is from a material witness who was listed in the NYCHA Defendants' initial disclosures but was not deposed in this matter. All declarations are less than ten double-spaced spaces.

The NYCHA Defendants thank the Court for consideration of this request.

Respectfully submitted,

/s/ Jane E. Lippman

cc: Marcel Florestal, Esq. (via ECF)
Natalie Marcus, Esq. (via ECF)